

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

IN RE:)	
)	
HUGH LAWRENCE BROOKS and)	
TAMMIE LATHERES SIMS-BROOKS)	
)	CASE NO. 09-02012-jmc-11
)	
Debtors.)	
_____)	
)	
HUGH LAWRENCE BROOKS,)	
)	Adv. Proc. No. 18-50350
Plaintiff,)	
)	
VS.)	
)	
AMERICAN EDUCATIONAL)	
SERVICES,)	
)	
Defendant.)	

**NOTICE OF AGREED INITIAL EXTENSION OF TIME TO RESPOND TO COMPLAINT
PURSUANT TO LOCAL BANKRUPTCY RULE B-7006-1**

Defendant, American Educational Services, by its counsel, files its Notice of Agreed Initial Extension of Time to Respond to Complaint Pursuant to Local Bankruptcy Rule B-7006-1 ("Notice"), providing an extension of time of twenty eight (28) days, from January 11, 2019 up to and including Friday, February 8, 2019, for it to respond to the Plaintiff, Hugh Lawrence Brooks' Complaint to Determine Dischargeability of Student Loan. As its Notice, Defendant states as follows:

1. On December 12, 2018, Plaintiff filed its Complaint to Determine Dischargeability of Student Loan (“Complaint”).

2. Defendant’s Answer to Plaintiff’s Complaint is presently due January 11, 2019.

3. Defendant typically services loans for other loan holders. Defendant is attempting to locate documentation identifying the holder of Plaintiff’s loan that is the subject of this lawsuit.

4. On January 9, 2019, Defendant, by counsel, requested Plaintiff’s counsel’s consent to an extension of time of twenty eight (28) days. Plaintiff’s counsel stated he had no objection.

WHEREFORE, Defendant, American Educational Services, by counsel, pursuant to Local Bankruptcy Rule B-7006-1 provides notice of an extension of time of twenty eight (28) days, from January 11, 2019 up to and including Friday, February 8, 2019, for it to respond to the Plaintiff, Hugh Lawrence Brooks’ Complaint to Determine Dischargeability of Student Loan.

Respectfully submitted,

**HALLER & COLVIN, P.C.
444 EAST MAIN STREET
FORT WAYNE, INDIANA 46802
TELEPHONE: (260) 426-0444
FAX: (260) 422-0274
EMAIL: ltipton@hallercolvin.com**

**BY: /s/ Lindsey M. Tipton
LINDSEY M. TIPTON
I.D. #34229-02**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the above and foregoing Notice has been sent electronically by the Court's electronic filing system, 10th day of January, 2019, to:

U.S. Trustee
Eric C Redman

/s/ Lindsey M. Tipton
LINDSEY M. TIPTON